



**General Aviation  
Manufacturers Association**

1400 K Street NW, Suite 801  
Washington, DC 20005-2485  
(202) 393-1500 • Fax (202) 842-4063

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Deepak Joshi  
Lead Aerospace Engineer  
National Transportation Safety Board  
Room 5235  
490 L'Enfant Plaza, SW.  
Washington, DC 20594

**Subject: Notice of Proposed Rulemaking (NPRM): Notification and Reporting of Aircraft Accident or Incidents and Overdue Aircraft, and Preservation of Aircraft Wreckage, Mail, Cargo, and Records**

The General Aviation Manufacturers Association (GAMA) is an international trade association representing over 50 manufacturers of fixed-wing airplanes, engines, avionics and components. In addition, GAMA member companies also operate aircraft fleets, airport fixed based operations, and pilot and maintenance technician training facilities across the nation. GAMA submits the following comments in response to the NTSB's Notice of Proposed Rulemaking (NPRM)—*Notification and Reporting of Aircraft Accident or Incidents and Overdue Aircraft, and Preservation of Aircraft Wreckage, Mail, Cargo, and Records*, published in the Federal Register (69 FR 247) December 27, 2004.

- Part 830.2 Definitions – GAMA believes that by removing the reference to ground damage to the helicopter rotor blades from the list of exclusions, the NTSB not only introduces potential new accidents to the industry, but also duplicates an effort already handled by the FAA and industry. This would also increase the burden on the operator and require duplicate reporting of events where ground damage occurs.
- Part 830.5 Immediate Notification – In this section the NTSB is requesting immediate notification of four additional events: (a) failure of internal turbine components that results in escape of debris; (b) structural failure of propeller resulting in all or a portion of a propeller blade from an aircraft; (c) loss of information from a majority of an aircraft's certified electronic display; and (d) any Airborne Collision and Avoidance System (ACAS) resolution advisories (RA) issued when an aircraft is being operated on an instrument flight rules (IFR) flight plan. GAMA has the following comments related to these events requiring immediate notification:
  - o (a) – GAMA believes that in accordance with current regulations [14 CFR 21.3(c)(10)], there is already a requirement to report this type of failure to the FAA, who have the regulatory oversight responsibility for events such as this. GAMA believes that requiring reporting of these events to the NTSB may result in the FAA not being aware of a problem. If the NTSB has identified a problem with



the current reporting system for failures of turbine components, GAMA believes that the NTSB should issue a Safety Recommendation to the FAA highlighting the problem.

- (b) – GAMA believes that in accordance with current regulations [14 CFR 21.3 (c)(5)], there is already a requirement to report this type of failure to the FAA, who have the regulatory oversight responsibility for events such as this. GAMA believes that requiring reporting of these events to the NTSB may result in the FAA not being aware of a problem. If the NTSB has identified a problem with the current reporting system for failures of propellers or propellers blades, GAMA believes that the NTSB should issue a Safety Recommendation to the FAA highlighting the problem.
- (c) – GAMA believes that in accordance with current regulations [14 CFR 21.3 (c)(13)], there is already a requirement to report this type of failure to the FAA, who have the regulatory oversight responsibility for events such as this. GAMA believes that requiring reporting of these events to the NTSB may result in the FAA not being aware of a problem. If the NTSB has identified a problem with the current reporting system for failures or malfunction of more than one attitude, airspeed, or altitude instrument (such as those displayed on an aircraft's certified electronic display,) GAMA believes that the NTSB should issue a Safety Recommendation to the FAA highlighting the problem.
- (d) – In the case of ACAS resolution advisories (RA), GAMA notes that an RA is an indication of the ACAS performing the job it was intended to perform. Therefore, GAMA does not see a reason why ACAS resolution advisories should be reported to the NTSB.

In conclusion, GAMA notes that the NTSB with this NPRM intends to start collecting data related to the airworthiness and design of a product, the oversight of which the FAA hold full regulatory responsibility for and the FAA works very closely with industry to monitor. Current regulations such as 21.3 and 23/25.1309 provide the necessary regulatory framework to ensure safe operation of these systems.

GAMA appreciates the opportunity to comment on this important NPRM. Please feel free to contact me at [jhennig@gama.aero](mailto:jhennig@gama.aero) or (202) 393-1500 if there are any questions or comments.

Sincerely,



Jens C. Hennig  
Manager of Operations